

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MOTION FOR LEAVE TO FILE OFFER OF PROOF CONCERNING ANTICIPATED  
TESTIMONY OF ANDRAS RIEDLMAYER ONE DAY LATE

During the pre-trial conference in this case on Friday, June 16, 2006, the undersigned stated that the government would provide to the Court an offer of proof concerning the anticipated testimony of Andras Riedlmayer, on Monday, June 19, 2006. The undersigned completed drafting the document over the weekend, but wanted to give Mr. Riedlmayer an opportunity to review the offer of proof before it was filed in order to insure its accuracy. Therefore, the draft was e-mailed to Mr. Riedlmayer. However, Mr. Riedlmayer was unable to check his e-mail messages and review the document until Monday evening June 19. Wherefore, the United States moves for leave to file the offer of proof one day late.

Respectfully submitted,

For the United States:

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Jeffrey Auerhahn  
JEFFREY AUERHAHN  
KIMBERLY P. WEST  
Assistant U.S. Attorneys

Dated: June 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that these documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF)

/s/ Jeffrey Auerhahn  
Jeffrey Auerhahn  
Assistant U.S. Attorney